

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

GARY CALOW,  
LARRY CALOW,  
RICKY BOROS, a/k/a "Vince Kwiatowski"  
SERGIO OLIVEIRA,  
RANDY SODERLUND, and  
BETH CALOW

CASE NUMBER:

UNDER SEAL

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From on and about approximately January 2003 through September 2006 in Cook County, in the Northern District of Illinois and elsewhere, defendants did, conspire with each other and others to distribute, and to cause to distribute, controlled substances including anabolic steroids, in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

I further state that I am a Special Agent, with the Drug Enforcement Administration and that this complaint is based on the following facts:

See Attached Affidavit.

Continued on the attached sheet and made a part hereof: X Yes      No

\_\_\_\_\_  
Christopher J. Geer, Special Agent, Drug Enforcement Administration  
Signature of Complainant

Sworn to before me and subscribed in my presence,

\_\_\_\_\_ at  
Date

Chicago, Illinois  
City and State

Arlander Keys  
Name & Title of Judicial Officer

\_\_\_\_\_  
Signature of Judicial Officer

STATE OF ILLINOIS     )  
                                      )  
COUNTY OF COOK        )

AFFIDAVIT

I, Christopher J. Geer, being duly sworn, state the following:

**Introduction**

1. I am a Special Agent of the Drug Enforcement Administration (DEA). I have been so employed since approximately 2003. I am currently assigned to the DEA Chicago Division. I have received extensive training pertaining to narcotic investigations and the investigation of various crimes which arise from drug trafficking activities. As part of my official duties, I have participated in and conducted investigations of violations of various State and Federal criminal laws, including unlawful possession with intent to distribute controlled substances, distribution of controlled substances, use of a communication facility to commit narcotic offenses, importation of controlled substances, conspiracy to import, possess and distribute controlled substances, and money laundering, all in violation of Title 21 and Title 18, United States Code.

2. I make this affidavit from personal knowledge based upon my participation in this investigation, as well as reports I

have read related to this investigation, conversations I have had with others who have knowledge of the events and circumstances described herein, and information received from other law enforcement officers, agents, and cooperating sources who participated in this investigation. Because this affidavit is being submitted solely for the purpose of establishing probable cause, it does not reflect all of my knowledge regarding this investigation.

3. This affidavit is being submitted in support of a criminal complaint charging that, beginning in approximately January 2003 and continuing through at least September 2006, GARY CALOW, LARRY CALOW, RICKY BOROS, aka VINCENT KWIATKOWSKI, SERGIO OLIVEIRA, RANDY SODERLUND, and BETH CALOW, with conspired with each other and others to distribute, and to cause to be distributed, controlled substances including anabolic steroids, in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

4. This investigation was initiated in 2005 by the Food and Drug Administration ("FDA") and the Drug Enforcement Administration ("DEA") following a complaint from a Individual A in Massachusetts that his son had used Individual A's credit card without permission to purchase anabolic steroids over the internet from [WWW.PMeds.COM](http://WWW.PMeds.COM). The ensuing DEA-FDA investigation

revealed that Purchase Meds, Inc., PMeds.com and the defendants named in this affidavit regularly distributed and dispensed and caused the distribution and dispensing of anabolic steroids and other controlled substances and prescription drugs without doctors' prescriptions through the PMeds website.

5. Anabolic Steroids are a Schedule III controlled substance. See Title 21, Code of Federal Regulations, (CFR) Section 1308. Any corporation or individual intending to import a scheduled controlled substance, such as anabolic steroids, into the United States, must possess a permit issued by the United States Drug Enforcement Administration. 21 CFR Section 1312. Neither PMeds nor any of the defendants named in this affidavit have sought or received a permit to import controlled substances into the United States.

6. PMeds was never licensed by the State of Illinois to act as a pharmacy, or registered with the Drug Enforcement Administration to distribute or dispense controlled substances or prescription drugs.

**INFORMATION FROM CS-1**

7. At GARY CALOW's request, CS-1<sup>1</sup> worked part-time at GARY CALOW's internet pharmacy business in Tinley Park, IL for a six month period beginning in approximately the summer of 2003. CS-1 was a web designer who assisted GARY CALOW in developing the PMeds and PURCHASEMEDS websites at 17201 S. Oriole, Tinley Park, Illinois (hereinafter "the Tinley Park house"). CS-1 also assisted GARY CALOW in processing internet drug orders. The Tinley Park house was equipped with four personal computers and two laptop computers and three employees and GARY CALOW who conducted drug transactions over the internet.

8. CS-1<sup>2</sup> stated GARY CALOW, his twin brother LARRY CALOW, and VINCE KWIATKOWSKI operated the PMeds and PURCHASEMEDS internet pharmacy business on a partnership basis.<sup>3</sup> GARY CALOW handled PMeds' business in Tinley Park; LARRY CALOW handled business interests in Mexico; and KWIATKOWSKI promoted PMeds and PURCHASEMEDS and obtained doctors to approve prescriptions when

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<sup>1</sup> CS-1, who has received letter immunity from the United States Attorney's Office, has no criminal history. The DEA has paid CS-1 \$400.

<sup>2</sup> Domains by Proxy reported that the domain PMeds.COM is registered to Gary J. Calow with an email address of [gcalow@yahoo.com](mailto:gcalow@yahoo.com) and an address of 17201 Oriole Ave., Tinley Park, IL.

<sup>3</sup> In June 2003, defendant KWIATKOWSKI signed an agreement that confirmed that GARY CALOW and LARRY CALOW owned 42.5% of the shares of Purchasemeds, Inc. and that he owned 15 percent of the company.

necessary. When Federal Express refused to ship orders without a prescription, GARY CALOW contacted KWIATKOWSKI to obtain a prescription from a doctor to send to Fed Ex. In October 2003, CS-1 observed KWIATKOWSKI drop off prescriptions for Fed Ex at the Tinley Park house. Approximately once a week, CS-1 observed Kwiatkowski pick up his share of income from the business in cash from GARY CALOW at the Tinley Park house. On occasion, when a PMeds' customer paid for their drug order with a personal check, KWIATKOWSKI would take the check and give GARY CALOW cash back at a later time.

9. CS-1 observed that GARY CALOW and others used the PMeds and Purchase Meds websites to market the sale of drugs over the internet. Customers orders were received through the websites by GARY CALOW at the Tinley Park house, who then relayed the orders to employees BETH CALOW<sup>4</sup> or Individual B, who typed customers' orders including the name and quantity of drug or medication and shipping information into a database. In addition, upon completion of the order, PMeds sent customers order numbers by email. GARY CALOW asked CS-1 to verify customer credit card payments. CS-1 also reviewed PMeds' paperwork including forms and receipts prepared by Beth Calow and Individual B for accuracy.

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<sup>4</sup> BETH CALOW used various emails addresses including [ann@PMeds.com](mailto:ann@PMeds.com). On March 11, 2004 BETH CALOW sent an email to GARY CALOW that stated, "Gary here is my checking account information. Routing #071000013, Account #651869190 Name on the Account is Beth Calow."

On average, the PMeds and PURCHASEMEDS websites received approximately 50 drug orders each day. PMeds' customers were not required to provide a doctor's prescription to the PMeds website to purchase controlled substances from the business. At the close of business each day, all order information was forwarded to LARRY CALOW in Mexico. LARRY CALOW then filled drug orders from Mexico and arranged for shipment from Mexico to customers throughout the United States.

10. On one occasion in 2003, GARY CALOW offered to obtain some prescription medication for CS-1. CS-1 explained that the drugs were eventually delivered to his/her residence from Mexico in an unmarked package. When he/she opened the package, he/she found no label on the medication, or any direction on how often to take the medication or in what dosage. CS-1 later asked GARY CALOW something to the effect, "Is this how you deliver this stuff to your customers?" GARY CALOW replied, "Yes, but when our customers order medication they know that is how we have to send it to them."

11. PMeds also utilized an 800 customer service number and CS-1, BETH CALOW and Individual B answered the PMeds telephone at the Tinley Park house. As the internet drug business took in more money, at GARY CALOW's request, CS-1 created an Excel spreadsheet to keep track of business income and expenses.

12. On at least two occasions in 2003, LARRY CALOW traveled from Mexico to deliver steroids to his brother Gary Calow at the Tinley Park house. CS-1 observed LARRY CALOW bring these steroids in the Tinley Park house in a duffel bag in the company of a Mexican woman. These steroids included liquid vials and syringes. GARY CALOW stored the steroids and other drugs in several boxes located in a closet on the second floor. Among the drugs that GARY CALOW stored was Clenbuterol, a medication misused by bodybuilders to metabolize fat and build muscle. However, the FDA only approved Clenbuterol for the treatment of horses with airway obstructions, not for humans. GARY CALOW regularly filled orders for steroids at the Tinley Park house for customers from a local health club, who came to the Tinley Park house to purchase steroids and other drugs.

13. In 2003, GARY CALOW injected himself with steroids in CS-1's presence. CS-1 observed that GARY CALOW was argumentative and occasionally violent while on steroids. CS-1 observed GARY CALOW take other drugs including anti-depressants and Ritalin to offset the effects of his steroid usage. CS-1 observed that GARY CALOW stored the steroids and other drugs in several boxes in certain places in the Tinley Park house including: a closet on the second floor; a refrigerator in his room; and a cabinet in the kitchen. GARY CALOW regularly filled orders for steroids at



the Tinley Park house for customers from a local health club. These customers came directly to the Tinley Park house to purchase steroids and other drugs.

14. In approximately November 2003, GARY CALOW traveled to Mexico to take his brother LARRY CALOW's place. At the same time, LARRY CALOW returned to the United States to manage the PMeds internet pharmacy operation from the Tinley Park house. GARY CALOW asked CS-1 to accompany him to Mexico but CS-1 declined.

#### **Co-Conspirator Statements**<sup>5</sup>

15. On April 29, 2003, LARRY CALOW<sup>6</sup> emailed the following message to RICKY BOROS which stated in pertinent part:

Vince I have been thinking about many things as I have much time to think down here [in Mexico]. I remember many things you said about the business growing and you were right. Things for [www.PMeds.com](http://www.PMeds.com) are going great. The problem is [www.purchasemed.com](http://www.purchasemed.com) really does not (sic) business at all. ....I think if you think you can assist in this I think you (sic) shares should be increased, You see [www.PMeds.com](http://www.PMeds.com) is doing great with illegal drugs, that scares me. I want to have one legal Pharmacy to get 100% legal. Please advice and assist, Larry.

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<sup>5</sup> The email messages described in Paragraphs 15 through 18 were obtained from Yahoo! pursuant to a federal search warrant.

<sup>6</sup> All email messages attributable to LARRY CALOW and GARY CALOW in this affidavit were sent to or received by email accounts [lcalow@yahoo.com](mailto:lcalow@yahoo.com) or [gcalow@yahoo.com](mailto:gcalow@yahoo.com). These email accounts connected to LARRY and GARY CALOW by information provided by CS-1 and the plain language of the email messages which identify the authors.

16. On May 1, 2003, LARRY CALOW emailed the following message to GARY CALOW<sup>7</sup>:

"I am looking at some of these orders from last night! The first thing I noticed is many people are ordering controlled medication. When we can make 300 to 400% WOW. That is the highest profits I personally have ever made. I translated many of these names over to generic which will increase our profits more."

17. On January 8, 2004, RICKY BOROS<sup>8</sup> sent an email to LARRY CALOW and GARY CALOW that stated,

"Larry & Gary - Congratulations to us all - we have passed the \$MILLION Mark on sales!!!!  
This is great! Now that we have worked out most of our bugs, we have to make every attempt to start running the operation as a real business and maximize our profit and efficiency. We should set up budgets for advertising, salaries, rents, medication, purchases, shipping, growth, etc. We also need accurate inventories so we can determine a correct profit margin and correct selling prices...I have been working with the girls here and am surprised to see that we have over a hundred orders which we have not completed. We have either shipping (sic) nothing or have shipped only a partial. They

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<sup>7</sup> All email messages attributable to LARRY CALOW and GARY CALOW in this affidavit were sent to or received by email accounts [lcalow@yahoo.com](mailto:lcalow@yahoo.com) or [gcalow@yahoo.com](mailto:gcalow@yahoo.com). These email accounts connected to LARRY and GARY CALOW by information provided by CS-1 and the plain language of the email messages which identify the authors.

<sup>8</sup> RICKY BOROS, a/k/a VINCE KWIATKOWSKI is identified as the user of email account [doctork@unixgroup.com](mailto:doctork@unixgroup.com) by the use of the name VINCE KWIATKOWSKI in the messages to and from this account.

tell me that we are especially short on orders for the following items: Lasix Dyazide, Dianabol/Winstrol tabs, Dianabol, Laurabolin, Alprazolam, Anadrol, Aquatest, Maxigan, Super Test. Is this correct? Please let me know your thoughts. Vince."  
(Emphasis added.)

18. On August 25, 2004 RICKY BOROS sent an email to GARY CALOW and LARRY CALOW that stated, "Here is the report of everything we have sold through credit cards in the last 3 months." A 10-page list was attached to this email naming various controlled substances including over 60,000 dosage units of Anabolic steroids and over 48,000 dosage units of Alprazolam (a Schedule IV controlled substance) as well as other controlled substances.

#### **Consensual Recordings**

19. On July 7, 2005, CS-1 made a consensual recording of a conversation with LARRY CALOW and RICKY BOROS, aka VINCE Kwiatkowski at BOROS' residence in Oak Brook, Illinois. LARRY CALOW told CS-1,

"I started PMeds ... Gary [CALOW] does not know how to run a f\_\_\_\_\_ business ... VINCE [Kwiatkowski] knows that GARY does not know how to run a company. I pretty much talk to [GARY] every day. When I went down [to Mexico] I wanted to make sure that the business was running properly."

VINCE KWIATKOWSKI told CS-1, among other things, that he had done an accounting of PMeds financial records and concluded that the business was short \$250,000 in income.

20. On July 26 2005, CS-1 made another consensual recording of a conversation with LARRY CALOW. CS-1 mentioned to LARRY CALOW that an owner of a local bar was interested in getting some "stuff" from [WWW.PMeds.COM](http://WWW.PMeds.COM). LARRY CALOW asked, "would those by chance be narcotics or anabolics?" LARRY CALOW then advised CS-1, that the bar owner could "order direct from PMeds." Later in the conversation LARRY CALOW asked CS-1 for his/her email address. He then stated that he could manufacture GHB<sup>9</sup> (Gamma hydroxy butyrate). LARRY CALOW explained that he would have the chemicals sent to him from Mexico.

21. On August 1, 2005, CS-1 and LARRY CALOW exchanged emails regarding the manufacture and distribution of GHB which CS-1 voluntarily provided to DEA agents. In that email, LARRY CALOW stated, "Gamma hydroxy butyrate yes know it well okay confirm he wants it and I will make some for him I need to order the chemicals does he want it in liquid or powder?"

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<sup>9</sup>The FDA reports that GHB is a chemical used to make floor stripper, paint thinner and other industrial products. It has been promoted as a steroid alternative for body building and recreational uses due to its intoxicating effects. GHB has never been approved for medical use in the United States. GHB is a Schedule I controlled substance.

22. On August 7, 2005, LARRY CALOW sent the following email to CS-1:

*"I need to get the chemicals to make GHB I have some in Mexico I will see if Gary will send them up here. The chemicals are controlled in the USA so they need to be smuggled into here. I will see what I can do I can also order the stuff from Europe but it could take up to 6 weeks so I want Gary to send it up. Please stay in touch. Sincerely Larry."*

**Evidence Recovered From Tinley Park House Trash Pulls**

23. Between May 18, 2005 and August 17, 2005, agents conducted several trash searches at 17201 Oriole Ave, Tinley Park, IL. Agents recovered numerous printed email communications among GARY CALOW, LARRY CALOW and others that demonstrated that PMeds took orders for and shipped various controlled substances including Schedule III and Schedule IV controlled substances to customers located throughout the United States. For example, an order dated February 21, 2005 revealed that PMeds sold the following Schedule III controlled substances for a sum of \$551.98 to a customer in Virginia: (1) Testosterone Enanthate, 10ml 250mg per cc; (2) Testoserone Propionate, 10 ml 200mg per cc; (3) Testosterone Cypionate, 10ml 200mg per cc; and (4) Testosterone Cypionate, 10cc bottle 250mg per cc. Agents also found a notice from U. S. Customs and Border Protection to this same PMeds' customer that part of this order had been seized at the border on March 21, 2005 as an unauthorized importation of anabolic

steroids into the United States. Another order dated May 7, 2005 showed that PMeds sold the anabolic steroid Power Animal Bold 200 (Equipoise) 200mg per cc 10cc bottle to a San Antonio, Texas customer for \$98.99 plus \$40.00 shipping.

24. In addition, agents recovered a "PMeds MEMO" dated September 14, 2003 from Gary Calow addressed to Larry [Calow] and VINCE [KWIATKOWSKI] entitled "PMeds SALES ENHANCEMENTS." In this memo, GARY CALOW urged his partners LARRY CALOW and RICKY BOROS, aka VINCE KWIATKOWSKI, to reduce expenses and improve customer service to "make PMeds #1 in Online Pharmacies."

25. The following email message was obtained by federal agents pursuant to a search warrant on Yahoo!. On December 3, 2005 GARY CALOW emailed LARRY CALOW, ANN (BETH CALOW), and MICHAEL (RANDY SODERLUND) with the subject "Encrypt your hard drives." The email stated

*"By early Monday morning I need all of you to encrypt your hard drive. Also, I want all paperwork that says PMeds on it to be burned to flush down the toilet. Do not throw it in the garbage. Larry can assist you in encrypting the drive. To reiterate encrypt your hard drives and remove all paperwork which has PMeds on it. If its important then scan it and place it on your hard drive before you encrypt the drive. Just FYI for you guys we are doing this as a prevention matter and for nothing more. Yes this is Import Gary."*

**SERGIO OLIVEIRA and Hi-Tech Pharmaceuticals, Inc. d/b/a Target Data, Target Data Processing and Planet Pharmacy Supplies PMeds With Controlled Substances**

26. This investigation has revealed that SERGIO OLIVEIRA<sup>10</sup>, of Hi-Tech Pharmaceuticals, Inc. d/b/a Target Data, Target Data Processing and Planet Pharmacy in Belize and elsewhere, was a source of supply of numerous types of controlled substances and prescription drugs for the PMeds internet pharmacy business that OLIVEIRA knew were destined for shipment to customers in the United States.

27. On December 25, 2003, SERGIO OLIVEIRA and GARY CALOW exchanged emails<sup>11</sup> regarding the shipment of controlled substances into the United States.

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<sup>10</sup> Sergio Oliveira and several other individuals as well as Hi-Tech Pharmaceuticals, Inc. d/b/a Target Data, Target Data Processing and Planet Pharmacy were indicted on September 7, 2006 in the Northern District of Georgia on importation of controlled substances, drug trafficking, mail fraud, wire fraud, and introduction of adulterated drugs into interstate commerce charges.

<sup>11</sup>The email messages described in Paragraphs 27 through 30 were obtained from Yahoo! pursuant to a federal search warrant.

An email from OLIVEIRA<sup>12</sup> to GARY CALOW stated,

"gary, thanks for the info. How many days does it usually take for your order to get to us customers and do you notice that some areas of the u.s. are much faster than others (for example, it takes forever to get to california customers)? Thanks. merry x-mas! sergio." (Emphasis added.)

GARY CALOW replied,

"We use regular mail and certified mail. The customer chooses the shipping type. Certified mail is cheaper in order to push it. The reason we don't sent everything certified is it would cut down on the orders. Some people won't sign for anabolics. We feel it is better to lose a few orders. Than to not receive a lot. Jay"

Your affiant believes that this email demonstrates that SERGIO OLIVEIRA knew that GARY CALOW shipped the majority of his anabolic steroids and other drugs from Mexico to customers in the United States.

28. On January 8, 2005 OLIVEIRA sent an email to GARY CALOW with an attachment labeled PMeds 101404.xls+.zip. The attachment consisted of two pages of invoices listing various Schedule III and IV controlled substances as well as dosages, tablet prices,

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<sup>12</sup> OLIVEIRA communicated with GARY CALOW and LARRY CALOW from the following email accounts: [Keytropoln@aol.com](mailto:Keytropoln@aol.com) and [PlanetBelize@aol.com](mailto:PlanetBelize@aol.com). Individual C, an employee of Hi-Tech identified [Keytropoln@aol.com](mailto:Keytropoln@aol.com) as Oliveira's email address in Belize in 2004. In addition, OLIVEIRA's business cards identify his email address as [Keytropoln@aol.com](mailto:Keytropoln@aol.com). Also, AOL records show that these two email accounts are billed to a Discover card in the name of SERGIO OLIVEIRA.



total tablets, and total price. On an invoice dated October 19, 2004, 25,000 tablets of anabolic steroids were listed including Methandrostenolone, Stanozolol, Oxandrolone, and Oxymetholone. This invoice also listed 50,000 tablets of Methylphenidate (Ritalin). The total cost to PMeds on this invoice was \$59,850. A second invoice dated November 15, 2004 included 20,000 tablets of Alprazolam (Xanax), 5,930 tablets of Diazepam, 1,000 tablets of Lorazepam, 650 tablets of Zolpidem, 9,900 tablets of Methylphenidate, and 7,240 tablets of Stanozolol. The total cost to PMeds for the drugs listed on this second invoice was \$16,012. Another part of the attachment included a ledger showing PMeds balances during 2004. This ledger included a June 1, 2004 beginning balance of \$30,435.28 and a December 30, 2004 ending balance of \$53,127.28. The ledger also listed numerous credits and debits including a \$59,850.00 debit on October 12, 2004 and a \$16,012.00 debit on November 11, 2004.

29. On March 8, 2005 SERGIO OLIVEIRA sent an email to GARY CALOW which stated, "Gary [Calow], I neglected to add the following to our list to review. I have also attached my account records for your review. I have issued credits for all orders you have shipped thus far except for the one above. Please see what you can do to get the balance down as low as possible by the time the next order is taken. Thanks. s" Attached to the email

were three pages of invoices dated March 25, 2005, April 4, 2005 and May 1, 2005. The March 25, 2005 invoice listed 60,000 tablets of Alprazolam (Xanax), 5,000 tablets Methandrostenolone (Dianabol), 10,000 tablets of Methylphenidate (Ritalin), 10,000 tablets of Oxandrolone (Anavar), 120,000 tablets of Phentermine (Fastex), 18,000 tablets of Stanozolol (Winstrol) and 5,000 tablets of Zolpidem (Ambien) for a total cost of \$79,150.00 to GARY CALOW at PMeds. The April 4, 2005 invoice listed 40,000 tablets of Diazepam (Valium) and 30,000 tablets of Lorazepam (Ativan) were listed for a total cost of \$14,000 to GARY CALOW at PMeds.

30. On March 26, 2005 SERGIO OLIVEIRA sent another email to GARY CALOW that stated, "attached reflects the 3 orders we discussed today plus a payment you would make this week s." The attached document was entitled "P MEDS Account Record.xls." The attachment included a balance B/F of \$30,435.28 on June 1, 2004 and an ending balance of \$12,926.28 on March 29, 2005 with numerous credits and debits on the list.

31. Bank records and email messages reveal that between November 12, 2003 and March 23, 2006, at the direction of SERGIO OLIVEIRA, GARY CALOW wire transferred approximately \$198,703 to Target Data and Planet Pharmacy bank accounts at the Atlantic International Bank Limited in Belize C.A.; the International Bank

of Miami; and the Banco Continental de Panama S.A. in payment for the delivery of controlled substances and prescription drugs. GARY CALOW used his personal bank account as well as the PURCHASEMEDS bank account at Bank One and later JP Morgan Chase Bank to make these wire transfers. Bank records further show that GARY CALOW was the only one with signature authority on his personal account and the PURCHASEMEDS accounts at Bank One and Chase. The address noted for both bank accounts was 17201 Oriole, Tinley Park, Illinois.

**Seizure of Steroids and Other Controlled Substances from PMeds Courier at Mexican Border in California in August 2005**

32. On August 20, 2005, a PMeds courier was stopped at the San Ysidro, California Port of Entry driving a vehicle with two large duffel bags that containing a large amount of pharmaceutical drugs including anabolic steroids. These drugs were packaged separately with different customer names on each package. The DEA Southwest Lab reported that the packages contained more than 11,000 dosage units of Schedule III anabolic steroids; more than 1,500 dosage units of Schedule IV controlled substances; and 60 dosage units of Methylphenidate aka Ritalin, a Schedule II controlled substance. The courier told the agents from DEA and Immigration and Customs Enforcement that he obtained the drugs from GARY CALOW in Tijuana, Mexico. The courier stated that GARY CALOW operated the online pharmacy [WWW.PMeds.COM](http://WWW.PMeds.COM) from

Toluca, Mexico. The courier further stated that he had picked up packages from Tijuana on approximately six previous occasions for GARY CALOW and shipped controlled substances to customers throughout the United States. The courier told agents that GARY CALOW had personally gave him the duffel bags and their contents for shipment on August 19, 2005 before he was stopped by U.S. Customs. The courier further advised that he communicated with GARY CALOW by email at gcalow@yahoo.com.

33. The courier's information has been corroborated by an email sent by GARY CALOW to BETH CALOW ([ann@pmeds.com](mailto:ann@pmeds.com); RANDY [SODERLUND] (customerservice@pmeds.com), the courier and others associated with PMeds internet pharmacy business just before the courier's arrest.<sup>13</sup> The message which was entitled "Tijuana 08/16/05," included a 9-page list of 190 orders scheduled for smuggling into the United States including 248 bottles, with customer names, addresses and tracking numbers. The courier was arrested when he attempted to bring these controlled substances into the United States.

#### **Controlled Purchase #1 From the PMeds Website**

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<sup>13</sup> This email was obtained from Yahoo! pursuant to a federal search warrant.

34. On September 8, 2005 an undercover DEA agent (UCA) ordered 200 mg cc of the anabolic steroid Deca 200, a Schedule III controlled substance, from the [WWW.PMeds.COM](http://WWW.PMeds.COM) website. PMeds did not require a doctor's prescription before filling the order. Agents made payment of \$139.99 via Western Union to PMeds. On September 9, 2005, the UCA received a confirmation email from [customerservice@PMeds.com](mailto:customerservice@PMeds.com) which read, "IMPORTANT!!!!!! Depending on what was ordered the packing might be deceptive. Please open up the package throughly (inside)!!!!!!!!!!" This email included a PMeds' customer service telephone number of (708) 444-2467, which phone records show was subscribed to RANDY SODERLUND of 17201 Oriole Ave, Tinley Park, IL. On September 21, 2005, the UCA called the PMeds customer service number and spoke to "Ann." CS-1 has identified Ann as BETH CALOW. BETH CALOW told the UCA that she needed to check the status of their DECA 200 order would likely ship on September 26, 2005 from Mexico via Fed-Ex or UPS and would take 1-2 days to arrive.

35. On September 27, 2005, the UCA picked up a package from Fed-Ex containing an audio/video converter from Electronicos Diaz, Paseo Tollocam #241, Col. Las Americas, Toluca, Mexico. DEA agents opened the converter with a screwdriver and observed a bottle that was wrapped in tinfoil and lead foil and glued inside the converter. The bottle was labeled Decanoato De Nandrolona.

The DEA North Central lab tested the contents of the bottle and reported that the bottle contained 20 dosage units of Nandrolone Decanoate, a Schedule III anabolic steroid.

36. Federal agents traced the payment for these anabolic steroids to a Purchasemeds bank account in the name of GARY CALOW at the JP Morgan Chase Bank with an address of 17201 Oriole, Tinley Park, Illinois.

#### **Controlled Purchase # 2 From the PMeds Website**

37. On October 19, 2005, a Food and Drug Administration undercover agent ("FDA UCA") ordered 200 mg cc of the anabolic steroid Deca 200 and Clenbuterol 20x20 mcg from the PMeds website, WWW.PMeds.COM. PMeds did not require a doctor's prescription for the drugs. The FDA UCA made payment of \$194.98 for the drugs by credit card and PMeds, in turn, provided an order number. On October 19, 2005, PMeds sent a confirmation email through [customerservice@PMeds.com](mailto:customerservice@PMeds.com) which stated, "IMPORTANT!!!!!! Depending on what was ordered the packing might be deceptive. Please open up the package thoroughly (inside)!!!!!!!!!!" This email also provided a telephone number of (708)444-2467, which was subscribed to RANDY SODERLUND of 17201 Oriole Ave, Tinley Park, IL.

38. On October 28, 2005 FedEx delivered a package with a return address in Mexico containing an audio/video converter to the FDA undercover post office box. FDA UCA found a bottle of steroids labeled "Decanoato De Nandrolona" concealed inside the

converter, along with a package of approximately 20 tablets of Clenbuterol<sup>14</sup>, all of which was wrapped in lead foil and glued inside the converter. Forensic analysis of the drugs PMeds sold to the FDA confirmed the presence of the anabolic steroid Nandrolone decanoate and Clenbuterol.

### **Controlled Purchase #3 From the PMeds Website**

39. On March 30, 2006, a DEA UCA ordered 60 tablets of Ambien (a Schedule IV controlled substance ) and 60 tablets of Ritalin (a Schedule II controlled substance) from [WWW.PMeds.COM](http://WWW.PMeds.COM) by credit card. PMeds charged \$201.52 for 60 tablets of Ambien and \$179.99 for 60 tablets of Ritalin and an additional charge of \$40 for shipping. PMeds did not require the UCA to provide a doctor's prescription, or obtain a prescription as part of the ordering process. On April 3, 2006, the UCA received an email from [customerservice@PMeds.com](mailto:customerservice@PMeds.com) which stated in part,

"IMPORTANT READ THE FOLLOWING!!!!!!! This message is to inform you that we have received your order at PMeds. IMPORTANT!!!! Your order will be placed inside of something this is necessary so that whatever is inside doesn't get crushed. You might need a

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<sup>14</sup> As discussed above, the FDA has not approved Clenbuterol for use by humans. On the contrary, the FDA has only approved this drug for use on horses. The FDA regulations note that Clenbuterol is "[i]ndicated by the management of horses affected with airway obstruction, such as occurs in chronic obstructive pulmonary disease." The regulations further provide "[t]reat at effective dose for 30 days. At the end of the 30-day period, drug should be withdrawn.... The effect of this drug on breeding stallions and brood mares has not been determined."

screwdriver in order to open the container!!!  
The order will come from Mexico or India!!"

40. April 21, 2006 [customerservice@PMeds.com](mailto:customerservice@PMeds.com) advised the UCA by email as follows:

"Sorry for the delay in the reply the computer where we get these emails went down. Normally the order would have shipped, but customs is really cracking down importations. We had to hold off shipping any orders out .... but were told that shipments will resume on Monday. We apologize for this inconvenience and hope that you will bear with us on this matter. Shipping said they sent it to a different location today to be shipped from there." (Emphasis added.)

41. On April 28, 2006, the UCA received a UPS package from Magali Contreras, Escobedo #900, Zona Centro, Mty. N.L., Mexico 64000. The package contained a shoe box which further contained a pair of women's shoes. The UCA found approximately 120 white pills concealed inside the heel of the shoes. The pills were packaged in plastic bags and glued inside the heels which were further lined with lead foil. The DEA North Central lab reported that the pills consisted of 59.6 dosage units of Methylphenidate, a Schedule II controlled substance, and 59.7 dosage units of Zolpidem, a Schedule IV controlled substance.<sup>15</sup>

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<sup>15</sup> Although the UCA specifically ordered and paid for brand name Ritalin and Ambien, PMeds shipped generic equivalents instead.



#### Controlled Purchase #4 From the PMeds Website

42. On May 4, 2006, a DEA UCA ordered three different types anabolic steroids including: Deca Durabolin (Orgenon Labs) 10x1mlx100mg ampules; Winstrol 100x25 mg tabs; and Dianabol (methadnrostenlone) from [WWW.PMeds.COM](http://WWW.PMeds.COM) for a total cost of \$549.97. PMeds did not require the UCA to provide a doctor's prescription, or obtain a prescription as part of the ordering process. PMeds provided the UCA with an order number after completing the transaction with an undercover credit card. On May 5, 2006, [customerservice@PMeds.com](mailto:customerservice@PMeds.com) sent an email to the UCA with the following message:

"Your recent order with PMeds. IMPORTANT READ THE FOLLOWING!!!!!! This message is to inform you that we have received your order at PMeds. Please read these instructions "IMPORTANT!!!!!! Your order will be placed inside of something this is necessary so that whatever is inside doesn't get crushed. You might need a screwdriver in order to open the container!!! The order will come from Mexico, India, or the US!!"

43. On May 15, 2006, [customerservice@PMeds.com](mailto:customerservice@PMeds.com) emailed the following message to the UCA,

"That package is coming from India and will arrive postal delivery is expected by the end of this week. The Other 2 items on the order come from Mexico, and will arrive FEDEX/UPS/DHL overnite when shipped."

44. On May 23, 2006, [customerservice@PMeds.com](mailto:customerservice@PMeds.com) sent the following email to the UCA:

"The status on your order has changed. The message sent from the merchant is. (Seized)<sup>16</sup> PARTIAL ORDER SHIPPED ON MAY 18<sup>TH</sup> 2006, ONE PACKAGE by FEDEX. (100 Winstrol)." (Emphasis added.)

Upon receipt of this message, the UCA placed a phone call to the phone number provided on the email and spoke with BETH CALOW, who identified herself as "Ann." (CS-1 has listened to a recording and identified the person speaking to the UCA as BETH CALOW.) The UCA asked BETH CALOW whether law enforcement had possession of the shipping address and BETH CALOW replied that Customs had intercepted packages in the past and that there would be no problem. BETH CALOW then instructed the UCA to provide her with a new shipping address for the steroid order.

45. On or about May 30, 2006, another package was delivered to a DEA undercover mailbox from Thrifty Solutions PVT., LTD., 202/203 Capri House-1, Alkapuri, Baroda-05, India 091-265-5563175. The box contained 10 ampules of a liquid marked Decadurabolin. The DEA North Central Lab reported that the

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<sup>16</sup> On September 21, 2006, this PMeds order arrived at the DEA P. O. Box. The package was forwarded by U. S. Customs and contained an electronic switch that had been broken open by Customs. (This investigation has revealed that PMeds regularly ships controlled substances from Mexico to the United States concealed in electronics equipment.) Customs later confirmed to DEA that Customs had confiscated the anabolic steroid Winstrol from this package on or about May 18, 2006.

ampules contained 23 dosage units of the anabolic steroid Nandrolone Decanoate, a Schedule III controlled substance.

46. On or about June 1, 2006, RANDY SODERLUND, aka MICHAEL, told the UCA over the PMeds customer service phone line that part of the steroids order would arrive from Mexico via UPS packaged in an electrical switch. (CS-1 has listened to a recording of this conversation and identified the person speaking to the UCA as RANDY SODERLUND.) SODERLUND instructed the UCA to look for the steroids inside a switch that would come in the package.

47. On or about June 1, 2006, UPS delivered another package to the DEA undercover mailbox from Monterrey, Mexico. The UPS envelope contained an electrical switch which further contained approximately 30 blue pills marked Dianabol that were wrapped in foil and rubber and glued inside the switch. The DEA North Central Lab reported that the pills contained 30 dosage units of the anabolic steroid Methandrostenolone, a Schedule III controlled substance.

48. On or about June 9, 2006, a third package was delivered to the DEA undercover mailbox from Jalisco, Mexico 45560. The package contained a data transfer switch that further contained 100 pink pills wrapped in copper wire and rubber and glued inside of the switch. The DEA North Central Lab reported that these

pills contained 100 dosage units of the anabolic steroid Stanozolol, a Schedule III controlled substance.

**Controlled Purchase #5 From the PMeds Website**

49. On June 29, 2006, an FDA UCA ordered two packages of the prescription drug Tamiflu from the PMeds website. PMeds did not require a doctor's prescription for the drugs. The FDA UCA made payment of \$209.97 for the drugs by credit card and PMeds, in turn, provided an order number. On or about July 6, 2006, FedEx delivered a package containing Tamiflu medication to a FDA post office box. The order confirmation from PMeds.com identified Purchase Meds, Inc. as the source of the drugs with an address in Mexico.

**Controlled Purchase #6 From the PMeds Website**

50. On July 19, 2006 a DEA UCA ordered the following anabolic steroids from PMeds: (1) Deca 320 20mlX320mg per ml Bottle; (2) Boldenone 220 (Equipoise) 20mlx220mg per ml Bottle; (3) Tamoxifen 14x20mg tabs; and (4) Sustanon 250 (Manufacturer Infar) 10x1mlx250mg ampules from [WWW.PMeds.COM](http://WWW.PMeds.COM). The UCA paid \$413.03 for the order with a credit card and PMeds provided the UCA an order number. PMeds did not require the UCA to provide a doctor's prescription, or obtain a prescription as part of the ordering process.

51. On July 28, 2006 the UCA received an email from customerservice@PMeds.com in response to an inquiry the UCA sent regarding tracking numbers. The message stated,

"This order will come in multiple packages, most of which all by mail. Yes, we know you paid FedEx, we can deal with the money part later. The Tamoxifen 14 X 20 mg Tabs and Sustanon 250 come from India and the Equipoise & Deca will be shipped from within the US. They will ship sometime by next weekend. The India should be shipping any day, it will arrive in about 10 business days from when it ships."

52. On or about August 15, 2006, two packages were delivered to a DEA undercover P. O. Box. One package arrived via air mail from India and contained 14 pills of Tamoxifen (not scheduled) and 10 X 1 ml vials of Sustanon 250 (a Schedule III anabolic steroids). The other package contained 2 X 10 ml bottles of Deca 320 and 2 X 10 ml bottles of (a Schedule III anabolic steroids) and was shipped from within the United States by an unknown addressee. All drug exhibits have been submitted to the DEA North Central Lab for analysis.

53. On August 16, 2006, a DEA agent contacted [customerservice@PMeds.com](mailto:customerservice@PMeds.com) claiming that the steroids had not been received. In response, [customerservice@PMeds.com](mailto:customerservice@PMeds.com) replied,

"The items on your order come from different places. You should have receive the bottles, they are address to you and the return address is also the same, so the package can not end up anywhere else but your box, and being that the bottles were shipped from a supplier

inside the US, means they can not have been stopped by anyone. If you noticed the products you received from India had a prescription with it. Who do you think paid for that? That came out of the FedEx shipping charge you were billed on. If you think that there is a company out there that gets the deliveries to you like we do, please send us there name. Also we want you to remember, if you protest charges for items you have received, you are making false accusations. Remember you just email us to tell us you receive product (Steroids) from India. We do not think that would sit well with your credit card company that you are ordering these type of products from various sources online. We are sure you are aware of all the steroid controversy." (Emphasis added.)

**GARY CALOW's payments to RANDY SODERLUND and BETH CALOW through his Personal Bank Account and Purchase Meds Bank Account**

54. Bank records show that GARY CALOW wire transferred a total of \$146,669 from his personal account at JP Morgan Chase Bank and the Purchase Meds account at the JP Morgan Chase Bank to RANDY SODERLUND's bank account that he shares with LARRY CALOW at the LaSalle Bank (\$97,744) and RANDY SODERLUND'S account in the name of Universal Services Unlimited at the Calumet Bank of Hammond (\$48,925) from January 23, 2004 through March 31, 2006.

55. Bank records show that GARY CALOW wire transferred a total of \$40,097 from his personal account at JP Morgan Chase Bank and the Purchase Meds account at the JP Morgan Chase Bank to BETH CALOW's bank account at the JP Morgan Chase Bank from January 23, 2004 through March 31, 2006.

**REQUESTED SEARCH WARRANT**

56. This affidavit is also made for the purpose of establishing probable cause in support of a warrant to search 17201 S. Oriole, Tinley Park, Illinois which is white two-story residence with a circular driveway and a two-car attached garage with the street number 17201 near the front door of the residence (See Exhibit A) in order to seize certain evidence relating to the commission of violations of the above-stated criminal offenses.

57. Based upon the investigation, 17201 S. Oriole, Tinley Park, Illinois is the residence of LARRY CALOW and RANDY SODERLUND. A search of public records revealed that defendant GARY CALOW is the current owner of 17201 S. Oriole, Tinley Park, Illinois. Furthermore, on multiple instances, surveillance agents have observed vehicles parked at this residence which are registered to defendants LARRY CALOW, BETH CALOW and RANDY SODERLUND at this address.

58. Based on my experience and the experience of other agents, drug traffickers commonly keep books, records, receipts, notes, ledgers, airline tickets, money orders, and other papers relating to the transportation, purchase, packaging, sale, and distribution of controlled substances. They also maintain books, papers, and documents that reflect names, addresses, and/or telephone numbers of their suppliers, couriers, customers, and

other associates in the drug trafficking organization. Many of these items may be maintained in either paper form or on computers, computer disks, CD-Rom disks, and related equipment. These documents are commonly maintained where the drug traffickers have ready access to them, such as in the residence at 17201 Oriole, Tinley Park, Illinois which doubles as the home office of the PMeds internet pharmacy business.

59. Drug traffickers commonly hide contraband, proceeds of drug sales, and records of drug transactions, drug sources, and drug customers, in secure locations within their residences, offices, garages, storage buildings, vehicles and safe deposit boxes for ready access, and also to conceal such items from law enforcement authorities.

60. Drug traffickers commonly keep large amounts of United States currency at their disposal in order to maintain and finance an ongoing drug business.

61. When drug traffickers amass large proceeds from the sale of drugs, they attempt to legitimize these profits, often by using the services of foreign and domestic banks, other financial institutions, and real estate brokers, and that books and papers related to such efforts, including, but not limited to, cashier's checks, money orders, telegrams, telexes, letters of credit and



ledgers, are maintained in their residences and/or places of business.

62. Drug traffickers frequently take, or cause to be taken, photographs of themselves, their associates in the drug trade, property acquired from the distribution of drugs, and their product, and that such photographs are often kept in their residences and/or places of business.

63. Drug traffickers very often place assets, including real and personal property, such as vehicles, in different names to avoid detection and forfeiture of such assets by government agencies, and that the drug traffickers continue to use these assets and to exercise dominion and control over them even though the assets are nominally owned by others

64. Drug traffickers often possess weapons, including firearms for protection.

65. Drug traffickers often use cellular phones and pagers to conduct their business.

66. In addition, this investigation has revealed that PMeds utilizes multiple computers to conduct its internet drug business at 17201 Oriole, Tinley Park, Illinois. Some or all of the defendants take orders for controlled substances over the PMeds website and communicate with PMeds customers and with each

other through multiple computers at the Tinley Park house. In addition, defendants utilize computers at the Tinley Park house to send drug orders to Mexico to have the orders filled and shipped to customers in the United States and elsewhere. For example: GARY CALOW has used [gcalow@yahoo.com](mailto:gcalow@yahoo.com); LARRY CALOW has used [lcalow@yahoo.com](mailto:lcalow@yahoo.com); BETH CALOW has used [ann@PMeds.com](mailto:ann@PMeds.com); and RANDY SODERLUND has used [michael@PMeds.com](mailto:michael@PMeds.com). In addition, the PMeds enterprise utilizes [customerservice@PMeds.com](mailto:customerservice@PMeds.com) to communicate with customers.

67. Because this warrant requests permission to search a computer, agents specially trained in the use and retrieval of information from computers will assist with the search of computers or computer related equipment.

68. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data, or whether additional resources, hardware or software may be required to analyze the data. In any event, however, data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even "hidden", erased, compressed, password protected or encrypted files. Since computer evidence is extremely vulnerable

to inadvertent or intentional modification or destruction (both from external sources or from destructive code embedded in the system as a "booby trap"), a controlled environment is essential to its complete and accurate analysis.

69. Data analysts may use several, different techniques to search electronic data for evidence or instrumentalities of a crime. These include, but are not limited to the following: examining file directories and subdirectories for the lists of files they contain, "opening" or reading the first few "pages" of a selected file(s) to determine their contents, scanning for deleted or hidden data, and searching for key words or phrases. It may be necessary to use several different search techniques to identify and seize data with evidentiary value, while leaving other data as undisturbed as possible.

70. Your Affiant believes, based upon his training and experience in investigating illegal internet pharmacy businesses, that the seized computer equipment from 17201 Oriole, Tinley Park, Illinois have been used to transact business in the purchase and sale of controlled substances and prescription drugs and that records relating this conduct will be stored on computers within 17201 Oriole, Tinley Park, Illinois. Your Affiant believes there is probable cause to search the computers within 17201 Oriole, Tinley Park, Illinois for all electronic data records relating to violations of Title 21, United States Code, Section 841, (distribution of a controlled substance) , Section 952 (importation of a controlled substance), Section

959(a) (manufacture or distribution for purpose of unlawful importation) and Sections 846 and 963 (attempt and conspiracy).

71. The search procedure of electronic data contained on computer hard drives and media may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

a. examination of all of the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth herein;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying various file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth herein;

d. opening or reading portions of files in order to determine whether their contents fall within the items to be seized as set forth herein;

e. scanning storage areas to discover data falling within the list of items to be seized as set forth herein, to possibly recover any such recently deleted data, and to search for and recover deliberately hidden files falling within the list of items to be seized; and/or

f. performing key word searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in Attachment B.

### **Conclusion**

72. Based on the foregoing facts, I believe there is probable cause to support the requested criminal complaint and that there is probable cause to believe that the house and garage at 17201 S. Oriole, Tinley Park, Illinois which is white two-story residence with a circular driveway and a two-car attached

garage with the street number 17201 near the front door of the residence contains fruits, evidence and instrumentalities of criminal offenses against the United States as identified in Attachment B, namely violations of Title 21, United States Code, Section 841, (distribution of a controlled substance) , Section 952 (importation of a controlled substance), Section 959(a) (manufacture or distribution for purpose of unlawful importation) and Sections 846 and 963 (attempt and conspiracy).

FURTHER AFFIANT SAYETH NOT.

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Christopher J. Geer  
Special Agent, DEA

SUBSCRIBED AND SWORN TO BEFORE  
ME THIS \_\_\_\_TH DAY OF OCTOBER 2006.

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ARLANDER KEYS  
U.S. Magistrate Judge

#### **ATTACHMENT A**

17201 S. Oriole, Tinley Park, Illinois which is white two-story residence with a circular driveway and a two-car attached garage with the street number 17201 near the front door of the residence. See Attached photo.

## **ATTACHMENT B**

### **ITEMS TO BE SEIZED:**

Evidence of violations of Title 21, United States Code, Section 841, (distribution of a controlled substance) , Section 952 (importation of a controlled substance), Section 959(a) (manufacture or distribution for purpose of unlawful importation)

and Sections 846 and 963 (attempt and conspiracy), including, but not limited to:

1) Financial information and statements, books, records, receipts, cash disbursements journals, safe deposit box keys, bank statements, state and federal tax returns, and other records related to the receipt, expenditure and concealment or other disposition of income;

2) United States Currency;

3) Records, notebooks, memoranda, receipts, ledgers, photographs, audio tapes, video tapes, lists and supplier or customer information relating to the purchase, sale, or distribution of controlled substances and prescription drugs;

4) Books, records, lists, receipts, bank and savings and loan records of deposit, statements and other bank records, letters of credit, money orders, cashiers' checks, passbooks, canceled checks, certificates of deposit, lease agreements, loan records, customer account information, income and expense summaries, cash disbursement journals, financial statements and related financial information pertaining to the purchase, lease, sale or other disposition of real or personal property, including real estate, vehicles, jewelry and furniture;

5) Safes, hidden compartments, and the contents therein.

6) Photographs of defendants with co-conspirators and assets obtained from drug trafficking;



7) Mobile cellular telephones and related equipment and the contents thereof, including antennas and power sources;

8) Any and all computers, including both hardware and software, and the contents thereof, which includes any and all magnetic media, including diskettes, magnetic tapes, hard drives or other items capable of storing computer information and any and all computer related documents and/or software manuals relating to the operation of the programs contained in such computers for the purpose of retrieving all stored data within that:

(i) provide information regarding the identities of the participants and/or coconspirators involved in violations of Title 21, United States Code, Section 841, (distribution of a controlled substance), Section 952 (Importation of a controlled substance), Section 959(a) (Manufacture or distribution for purpose of unlawful importation) and Sections 846 and 963 (Attempt and Conspiracy);

(ii) may be used or have been used to transact the purchase or sale of controlled substances and prescription drugs;

iii) all information relating to the use of financial institutions including but not limited to banks or currency exchanges to send or receive money;

iv) all information relating to the use of bank accounts;  
and

v) all information relating to the use of proceeds from distribution of controlled substances;

9) The search shall be conducted pursuant to the following protocol:

With respect to the search of any computers or electronic storage devices seized from the location, the search procedure of electronic data contained in any such computer may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized listed in this Attachment:

a. examination of all of the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth herein;

b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);

c. surveying various file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth herein;

d. opening or reading portions of files in order to determine whether their contents fall within the items to be seized as set forth herein;

e. scanning storage areas to discover data falling within the list of items to be seized as set forth herein, to possibly recover any such recently deleted data, and to search for and recover deliberately hidden files falling within the list of items to be seized; and/or

f. performing key word searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in this Attachment.